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**SFUND RECORDS CTR  
2389975**

December 12, 2018

**VIA FEDERAL EXPRESS AND E-EMAIL**

Kim Muratore, Case Developer (SFD-7-5)  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: CERCLA Section 104(e) Information Request Letter  
Orange County North Basin Study Area, Orange County, California**

Dear Ms. Muratore:

Enclosed for your review is the response of PI. US Holding, Inc. ("PI. US Holding") to the U.S. Environmental Protection Agency ("EPA") Request for Information pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), dated September 11, 2018 and received by PI. US Holding, Inc. on September 26, 2018 regarding a facility formerly located at 601-675 South Placentia Avenue, Fullerton, California.

In addition to the specific questions included in the September 11, 2018 Requests for Information, PI. US Holding, Inc. provides the following clarifying information:

The EPA Request for Information requests documentation related to "PI. US Holding, Inc." However, two Delaware corporations have that name, one incorporated in 1984 (DE #2044851) and the other in 1988 (DE #2172457). The PI US Holding, Inc. incorporated in 1988 ("1988 PI. US Holding") merged with other Rheem-affiliated organizations in 2005 and the successor organization took the form of the PI. US Holding, Inc. incorporated in 1984 ("1984 PI. US Holding"). See RMC098-RMC113. Unless otherwise stated, the attached responses are provided on behalf of the currently active 1984 PI. US Holding.

The following responses are based on PI. US Holding's review of located historical documents dating from approximately seventy years ago. Although PI. US Holding has performed a thorough search of its archival documents to support these responses, due to the length of time that has passed since the 1930 RMC potentially had any relationship with the Fullerton Facility, very little information pertinent to the requests remains in existence.

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PI. US Holding reserves the right to amend the following responses should additional information or documents be obtained that would shed additional light on these issues. Please do not hesitate to contact me with any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line.

Angela Jean Levin

Enclosures

cc: Brennan Stewart, [Breenan.Stewart@rheem.com](mailto:Breenan.Stewart@rheem.com)

## **RESPONSES TO SEPTEMBER 11, 2018 REQUEST FOR INFORMATION**

**REQUEST 1.** State the full legal name, address, telephone number, email address, and position(s) held by any individual answering any of these questions on behalf of PI. US Holding, Inc., its predecessor Rheem Manufacturing Company, and any of their affiliated entities (together, "the Company").

**RESPONSE:** Angela Jean Levin  
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580 California Street  
San Francisco, California 94104  
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Fax 415-477-5710  
[Angela.Levin@troutman.com](mailto:Angela.Levin@troutman.com)

**REQUEST 2:** Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 601-675 South Placentia Avenue, Fullerton, California ("the Facility").

**RESPONSE:** PI. US Holding objects to this request to the extent that it requests a legal conclusion regarding PI. US Holding's status as an owner or operator of the Fullerton Facility. Subject to the foregoing objection, based on the documents that PI. US Holding has located in its possession, custody, and control, in 1955, the Rheem Manufacturing Company, incorporated in 1930 ("1930 RMC") began constructing a new plant in Fullerton, California ("Fullerton Facility"). RMC036. 1930 RMC began operations at the Fullerton Facility in October 1956 under a long-term lease. RMC038; RMC302. Then, in January 1961, 1930 RMC closed the Fullerton Facility, sold the production equipment, and leased the plant to another company. RMC062; RMC482. PI. US Holding could not locate any documentation in its possession, custody, and control regarding the date that 1930 RMC completely terminated its relationship with the Fullerton Facility. PI. US Holding reserves that right to assert that, despite any past relationship with the Fullerton Facility, 1930 RMC was not an owner or operator of the Fullerton Facility under the applicable legal meanings of the terms.

**REQUEST 3.** Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates the individual held such positions.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control that provide the information requested by Request No. 3. PI. US Holding has limited information regarding any employees or individuals associated with the Fullerton Facility and no information regarding their

responsibilities for environmental matters. Nevertheless, past annual reports reference Mr. F.G. Fisher as the Vice President and General Manager of the Automotive Division before and after 1930 RMC moved its automotive manufacturing operations to the Fullerton Facility. RMC039; RMC240. Also, the 1958 and 1959 Annual Reports reference Mr. O.W. Carrico who, on March 13, 1958, was promoted to the Vice President and General Manager of the Automotive Division at the Fullerton Facility. RMC059; RMC175; RMC180; RMC372; RMC388; RMC393. Further, the 1960 Annual Report states that Mr. Claude E. Modesitt and Mr. Walter E. Schulz, Jr. were appointed to Vice President-Operations and Vice President-Controller, respectively, of the Automotive Division. RMC454. However, Mr. Fisher's, Mr. Carrico's, Mr. Modesitt's, and Mr. Schulz's respective statuses and whereabouts are unknown.

**REQUEST 4.** Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included operations that utilized or generated these hazardous substances, or who were responsible for storing/filling/disposing of hazardous substances and/or wastes containing the above-identified chemicals. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control that provide the information requested by Request No. 4. Please see response to Request No. 3 for a list of the individuals that PI. US Holding has identified as being associated with the Fullerton Facility.

**REQUEST 5.** Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control that provide the specific information requested by Request No. 5. Please see response to Request No. 3 for a list of the individuals that PI. US Holding has identified as being associated with the Fullerton Facility.

**REQUEST 6.** Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as its operational status (e.g., whether and where business operations are currently occurring).

**RESPONSE:** PI. US Holding objects to this request as overbroad and seeking information that is not relevant to EPA's investigation at the Fullerton Facility to the extent that it seeks the requested information for corporate entities and locations completely unrelated to the Fullerton Facility. Subject to the foregoing objection and based on the documents that PI. US Holding has located in its possession, custody, and control, 1984 PI. US Holding is operational and authorized to conduct business in Delaware. *See* RMC077-RMC079; RMC218. According to a June 26, 1975 Agreement and Plan of Merger, 1930 RMC ceased to exist after merging with Civistco, Inc. RMC065-RMC076.

**REQUEST 7.** Provide the date and in which State the Company was incorporated, formed, or organized.

**RESPONSE:** Based on the documents that PI. US Holding has located in its possession, custody, and control, 1930 RMC was incorporated in the State of California on January 22, 1930. RMC011-RMC014. Also, based on the documents that PI. US Holding has located in its possession, custody, and control, 1984 PI. US Holding incorporated in Delaware on September 24, 1984 under the name N.R., Inc. RMC077-RMC079; RMC087-RMC089; RMC098-RMC113; RMC218.

**REQUEST 8.** Describe the corporate relationship (e.g., parent, subsidiary, division, predecessor, successor) between the Company and each of the following entities: Aerojet Ordnance Co.; Aerojet Rocketdyne, Inc. (f/k/a, Aerojet General Corporation); Rheem Acceptance Corporation; and Rheem Automotive Company. Please also provide the corporate status (e.g., active, suspended, defunct, merged, dissolved) of each of these entities, if known.

**RESPONSE:** Based on the documents that PI. US Holding has located in its possession, custody, and control, 1930 RMC entered into an agreement for the acquisition of United State Spring and Bumper Company on February 4, 1954. RMC019. In 1955, 1930 RMC made plans to voluntarily dissolve U.S. Spring and Bumper, RMC020-RMC034, which, according to publicly available information, became effective on April 4, 1956. RMC005. Effective January 1, 1956, the former United States Spring and Bumper Company was absorbed into 1930 RMC as a division of the 1930 RMC under the fictitious name of "Rheem Automotive Company." RMC024-RMC027; RMC313.

Based on the documents that PI. US Holding has located in its possession, custody, and control, according to a 1958 Annual Report for 1930 RMC, Rheem Acceptance Corporation was a subsidiary of 1930 RMC established "to assist dealers in financing sales of Rheem products," as well as consumers. RMC175; RMC194; RMC379; RMC388; RMC415; RMC443; RMC471. The 1930 RMC annual reports list the location of Rheem Acceptance

Corporation in Rheem, California, with offices also in Los Angeles, Oakland, and Hayward, California. RMC175; RMC388; RMC443. In 1962, 1930 RMC exchanged its ownership in Rheem Acceptance Corporation for shares in the Atlas Credit Corporation. RMC497.

PI. US Holding is not aware of any corporate relationship between the Company and Aerojet Ordnance Co. or Aerojet Rocketdyne, Inc. (f/k/a, Aerojet General Corporation).

**REQUEST 9.** Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name.

**RESPONSE:** Based on the documents that PI. US Holding has located in its possession, custody, and control, 1930 RMC was originally formed as a California corporation on January 22, 1930. RMC116. According to publicly available information, PI. US Holding is an active corporation. *See* RMC218.

**REQUEST 10.** If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.

**RESPONSE:** According to the documents that PI. US Holding has located in its possession, custody, and control, after acquiring U.S. Spring and Bumper Company, 1930 RMC dissolved U.S. Spring and Bumper on April 4, 1956. RMC005. Effective January 1, 1956, 1930 RMC transferred the U.S. Spring and Bumper operations to a division of 1930 RMC under the fictitious name of "Rheem Automotive Company." RMC024-RMC027; RMC313.

Since it began leasing the Fullerton Facility to another unknown entity, 1930 RMC has undergone numerous mergers and reorganizations. *See* RMC065-RMC076; RMC087-RMC089; RMC090-RMC097; RMC098-RMC113. On June 30, 1975, 1930 RMC merged with Civestco and the surviving corporation was named Rheem Manufacturing Company and incorporated in Delaware ("1974 RMC"). RMC065-RMC076. As part of the transaction, the 1930 RMC ceased to exist. RMC065-RMC076. On December 13, 1984, N.R. Inc. merged with 1974 RMC and the surviving corporation was named Rheem Manufacturing Company ("1984 RMC"). RMC087-RMC089. Again, as part of the transaction, 1974 RMC ceased to exist. RMC087-RMC089. Further, during a 2005 internal reorganization, 1984 RMC merged with multiple other entities, including the 1988 PI. US Holding. RMC090-RMC097; RMC098-RMC113; RMC201-RMC217; RMC506-RMC522;

RMC523-RMC534. The surviving entity took the form of 1984 PI. US Holding (f/k/a N.R. Inc.). RMC098-RMC113. 1984 and 1988 PI. US Holding reserve the right to assert that one or more of these mergers or reorganizations severed either or both of 1984 and 1988 PI. US Holding's relationship with 1930 RMC and thus any potential successor liability for any portion of the Fullerton Facility.

**REQUEST 11.** If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

**RESPONSE:** As referenced above in Response No. 8 and 10, based on the documents that PI. US Holding has located in its possession, custody, and control, Rheem Automotive was a fictitious name of a 1930 RMC division during at least part of the time 1930 RMC leased the Fullerton Facility. RMC024-RMC026.

**REQUEST 12.** If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, change the types of solvents being used).

**RESPONSE:** Based on the documents that PI. US Holding has located in its possession, custody, and control, it does not appear that 1930 RMC ever owned, and therefore ever sold, the Fullerton Facility. In 1955, the Company physically transferred its automotive parts manufacturing capability from a plant in Vernon, California to the Fullerton Facility and documents indicate the Company began operating at the Fullerton Facility in October 1956 under a long-term lease. RMC037-RMC039. Based on the documents that PI. US Holdings has located in its possession, custody, and control, in January 1961, 1930 RMC ceased its operations at the Fullerton Facility and began leasing it to another, unknown company. RMC062.

**REQUEST 13.** If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by the Company after it began operating at the Facility that changed (either increases or decreases) the use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

**RESPONSE:** Based on the documents that PI. US Holding has located in its possession, custody, and control, 1930 RMC began constructing the Fullerton Facility in

1955. RMC036. However, this documentation does not state the prior use of the property on which the Fullerton Facility was located.

**REQUEST 14.** For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.

**RESPONSE:** As referenced in Response No. 12, based on the documents that PI. US Holding has located in its possession, custody, and control, it does not appear that 1930 RMC ever owned the Fullerton Facility. According to the documentation PI. US Holding has located in its possession, custody, and control, in 1961, 1930 RMC closed the Fullerton Facility, sold the production equipment, and began leasing the facility to another company. RMC062. However, the identity of this lessee and their use of the Fullerton Facility are unknown to PI. US Holding.

**REQUEST 15.** For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.

**RESPONSE:** According to the documents that PI. US Holding has located in its possession, custody, and control, 1930 RMC constructed the Fullerton Facility in 1955 and began operations at the Fullerton Facility in October 1956 under a long-term lease. RMC036; RMC038; RMC302. However, these documents do not identify the lessor.

**REQUEST 16.** Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.

**RESPONSE:** Based on the documents that PI. US Holding has located in its possession, custody, and control, the Fullerton Facility was originally constructed to "provide modern, automated, high-volume production lines" for the Automotive Division, as well as "expand its line of farm tools." RMC036. In 1956, the Fullerton Facility was approximately 500,000 square-feet on 56 acres of land, employed approximately 1,000 people, and designed to manufacture a variety of automobile parts, but "chiefly springs and bumpers." RMC039. In 1958, the Fullerton Facility manufactured "[b]umpers, springs, and other automotive parts." RMC175. This production line increased in 1959 and 1960 to "[b]umpers, leaf springs, coil springs, torsion bars, bumper support bars, hot and cold formed stampings, [and] other automotive parts." RMC059; RMC443. Production ended in 1961 when 1930 RMC shut down its operations at the Fullerton Facility. RMC062.



**REQUEST 17.** Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

- a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
- b. Subsurface structures (e.g., underground tanks, surrips, pits, clarifiers);
- c. Stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
- d. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and
- e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 17. However, general pictures of the Fullerton Facility are provided in multiple annual reports. RMC343; RMC344; RMC400; RMC412; RMC426; RMC439; RMC454.

**REQUEST 18.** Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 18.

**REQUEST 19.** Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 19.

**REQUEST 20.** Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 20.

**REQUEST 21.** For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information:

- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;
- b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;
- c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
- d. The quantity purchased (in gallons) and the time period during which it was used; and
- e. Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 21.

**REQUEST 22.** Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.

- a. State whether the information provided represent a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.
- b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 22.

**REQUEST 23.** Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but that

was never completed. Explain, to the best of your ability, why the sampling was not conducted.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 23.

**REQUEST 24.** Provide copies of any due diligence reports or property transfer assessments related to the Facility.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 24.

**REQUEST 25.** Identify, and provide the following information for, all groundwater wells located at the Facility:

- a. A map with the specific locations of the groundwater wells;
- b. Dates of well construction;
- c. Depth to groundwater, depth of well, and depth to and of screened intervals;
- d. Uses of each well;
- e. Date each well was abandoned, if applicable;
- f. Date each well was sampled;
- g. All constituents analyzed for during groundwater sampling events; and
- h. All groundwater sampling results, reports of findings, and analytical data.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 25.

**REQUEST 26.** Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 26.

**REQUEST 27.** For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 27.

**REQUEST 28.** If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 28.

**REQUEST 29.** Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 29.

**REQUEST 30.** Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:

- a. The date each release occurred;
- b. The cause of each release;
- c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
- d. Where each release occurred and what areas were impacted by the release; and
- e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 30.

**REQUEST 31.** Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

**RESPONSE:** PI. US Holding has located no documents in its possession, custody, or control related to the 1930 RMC's operations at the Fullerton Facility that provide the information requested by Request No. 31.